

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

RALPH S. JANVEY, IN HIS CAPACITY AS  
COURT-APPOINTED RECEIVER FOR THE  
STANFORD INTERNATIONAL BANK, LTD.,  
ET AL.

Plaintiff,

V.

JAMES R. ALGUIRE, ET AL.

Defendants.

Case No. 3:09-CV-0724-N-BG

RALPH S. JANVEY, IN HIS CAPACITY AS  
COURT-APPOINTED RECEIVER FOR THE  
STANFORD INTERNATIONAL BANK, LTD.,  
ET AL.

Plaintiff,

V.

MIGUEL VENGGER, ET AL.

Defendants.

Case No. 3:10-CV-0366-N-BG

RALPH S. JANVEY, IN HIS CAPACITY AS  
COURT-APPOINTED RECEIVER FOR THE  
STANFORD INTERNATIONAL BANK, LTD.,  
ET AL.

Plaintiff,

V.

JOSE MANUEL FERNANDEZ, ET AL.

Defendants.

Case No. 3:10-CV-1002-N-BG

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**AGREED STIPULATION REGARDING MOTION TO COMPEL**

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Plaintiff Ralph S. Janvey, in his capacity as Court-appointed Receiver for the Stanford entities (the “Receiver”), and certain Defendants<sup>1</sup> in the above-captioned lawsuits file this Agreed Stipulation Regarding Motion to Compel. The Receiver and the Defendants state as follows:

1. On August 4, 2015, the Defendants filed their Motion to Compel (the “Motion”) in the above-captioned lawsuits.<sup>2</sup> On August 24, 2015, the Receiver and the Defendants filed a stipulation extending the Receiver’s deadline to file his response to the Defendants’ Motion to August 27, 2015.

2. The Receiver and the Defendants have resolved the issues raised in the Motion by agreement and have set forth procedures to resolve certain issues in the future in the event they become relevant to the litigation. Accordingly, the Receiver and the Defendants hereby stipulate that the Motion to Compel filed on August 4, 2015 is withdrawn.

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<sup>1</sup> The term “Defendants,” as used herein, refers to the following defendants in the above-captioned cases: James E. Brown, Sr.; Murphy Buell; Robert L. Bush; Gene Causey; Darrell D. Courville; Robert B. Crawford, Jr. (Deceased); Jodie F. Crawford; Daniel Joseph Daigle; Jilda Ann Daigle; Kenneth Dougherty; William Ensminger; Equus VIII, LLC; Gwendolyn Fabre; Richard S. Feucht; Joan A. Feucht; Clarence H. Forshag; Betty Jo Forshag (Deceased); Robert S. Greer; Alice D. Greer; The Estate of James Holden; The Estate of Henrietta Holden; Judy Palmisano Jones; Dennis L. Kirby; Laura Jeannette Lee; Troy L. Lillie, Jr.; Charles L. Massey; Ronald B. McMorris; Virginia H. McMorris; Peggy Payne Moragne; Larry W. Perkins; Monty M. Perkins; Jeff P. Purpera, Jr.; Robert Rubin; The Estate of Edward S. Rubin; Charles R. Sanchez; Mamie C. Sanchez; Thomas Slaughter; Larry N. Smith; Michael A. Speeg; Terry N. Tullis; Thomas H. Turner; Emolyn L. Watts; Arthur Waxley, Jr.; and James T. Weiner.

<sup>2</sup> (See Case No. 3:09-CV-0724-N-BG, Docs. 1340–42; Case No. 3:10-CV-0366-N-BG, Docs. 529–31; Case No. 3:10-CV-1002-N-BG, Docs. 258–60.)

Dated: August 27, 2015

Respectfully submitted,

**BAKER BOTTS L.L.P.**

By: /s/ Scott D. Powers

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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

On August 27, 2015, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. I hereby certify that I will serve all parties and counsel of record electronically or by other means authorized by the Court or the Federal Rules of Civil Procedure.

/s/ Scott D. Powers  
Scott D. Powers